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From: Dresser, Chris
Sent: Mon 6/20/2016 8:30:46 PM
Subject: responses to WEA questions

Please see the following responses to WEA's content questions:

- What are the anticipated contents/requirements of the basin specific FIP?

One of the stated goals of the rulemaking has been to create a "level playing field" among operators producing oil and gas on State and Tribal lands in the Uinta Basin. EPA has developed the specific requirements in the FIP with this goal in mind - including consideration of existing requirements on Utah state land and other national rules.

- What are the anticipated cost/benefits of additional controls?

A Regulatory Impact Assessment has been developed that includes a detailed discussion of the economic impacts of the proposed FIP.

- How is EPA leveraging the 2014 Uinta Basin Emissions Inventory?

The phase 1 oil and gas inventory was developed using operator submitted activity and emissions information; and was finalized in May, 2016. Unfortunately, the inventory was unavailable when the emissions and rule impacts were being evaluated for the proposed FIP. EPA will consider the 2014 Uinta Basin emissions inventory for the final version of the rulemaking.

- Has EPA modeled what effect will the proposed controls have on Uinta Basin ozone levels?

Research has shown that ozone levels in the Uinta Basin are most significantly influenced by VOC emissions from the accumulation of existing minor oil and natural gas production operations. Although we know the ozone impact of VOC reductions will be large and beneficial, there are limitations on our ability to specifically quantify it, and thus monetize the benefits. Model simulations that are currently available are not sufficiently reliable for estimating public health benefits of emissions reduction. That is, we cannot state with certainty the amount of

ozone reductions that will result from the large VOC reductions we expect this rule to produce, but modeling and measurement studies show that ozone is sensitive to changes in VOC emissions, and we expect that large reductions in VOC will result in proportionally large reductions in ozone formation.

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